UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Ms. Sandra Lyon, Superintendent
Santa Monica Malibu Unified School District
1651 Sixteenth Street
Santa Monica, California 90404
slyon@smmusd.org

Dear Superintendent Lyon:

Thank you for submitting your polychlorinated biphenyl (PCB) cleanup application to EPA. The application (enclosed) consists of the "Site-Specific PCB-Related Building Materials Management, Characterization and Remediation Plan for the Library and Building E Rooms 1, 5, and 8 at Malibu High School" dated July 2014 as subsequently amended[1]. The application addresses removal of PCB-containing caulk, remediation of the substrate in contact with this caulk, verification sampling, and continued implementation of best management practices (BMPs).

The Toxic Substances Control Act (TSCA) regulations prohibit the use of caulk containing PCBs at or above 50 ppm (PCB-containing caulk). When found, PCB-containing caulk must be removed and disposed of in accordance with TSCA regulations. Under the District's plan contained in the application, the District proposes to (1) remove PCB-containing caulk currently known and verified at Malibu High School no later than June 30, 2015; and (2) remove any newly discovered PCB-containing caulk within one year after the District verifies that the caulk contains PCBs at or above 50 ppm at Malibu High School (MHS) and Juan Cabrillo Elementary School (JCES).

Pursuant to 40 CFR 761.61(c), EPA is approving the proposed procedures from the District's application to address the substrate in contact with the PCB-contaminated caulk following removal of the caulk (known as PCB remediation waste) at MHS and JCES. Specifically, the following procedures apply to substrate in contact with presently identified PCB-contaminated caulk as well as such areas identified in the future:

- Porous substrates (e.g., concrete) will receive the following treatment after PCB-containing caulk is removed: Surface preparation and application of a double coat of a non-VOC epoxy-based sealant followed by application of new caulk. Surface wipe verification testing will also be performed. The approved provisions are contained in the application in sections F.1.6, F.1.10 and the supplement.
- Non-porous substrates (e.g., metal) will be decontaminated with a solvent to achieve a surface wipe concentration of less than 1 ug/100 cm^2 based on verification wipe tests. The

[1] The District's application was amended by an email message from Jan Maez to Tom Huetteman on August 14, 2014 and the "Supplemental Removal Information for the Library, Building E – Rooms 1, 5, and 8 and Building G – Room 506 at Malibu High School" dated September 26, 2014.

approved provisions are contained in the application in sections F.1.5, F.1.9 and the supplement.

- BMPs will be implemented regularly with weekly, monthly and annual procedures. These procedures must be implemented until such time that EPA approves a modification. The approved provisions are contained in the application in sections 1.2, C.1.2, F.1.6, and the supplement.
- Periodic air and surface wipe samples will be collected to monitor the remediation measures until major renovation or demolition. Initial monitoring will be performed through the summer of 2015, and then a new schedule of monitoring will be proposed for EPA approval based on initial monitoring results. The approved provisions are contained in the application in sections 1.2.3 and the supplement.
- Removal or decontamination of porous substrates to 1 ppm will occur at the time of major renovation or demolition. Consistent with section 1.4 in the application, the District will submit a detailed site-specific remediation plan to EPA at least 60 days prior to the planned renovation/demolition.

An approval under 40 CFR 761.61(c) requires EPA to make a finding that PCB remediation wastes remaining in place at MHS and JCES will not pose an unreasonable risk of injury to health or the environment. EPA is hereby making a finding that the remediation actions undertaken and planned by the District meet this TSCA standard for MHS and JCES.

First, the District has demonstrated that conditions at the school presently meet EPA national guidelines to protect public health from PCBs in schools. Following EPA guidance, the District implemented a plan of BMPs that included improved cleaning procedures, identification and removal of PCB-containing fluorescent light ballasts, and inspection and repair of deteriorating caulk. To evaluate exposures to PCBs and the effectiveness of BMPs, the District collected 163 air and 503 surface wipe samples.

The air and surface wipe testing results were compared to health-protective screening levels before and after the implementation of BMPs. Only two pre-BMP and none of the post-BMP air samples were above the applicable EPA public health levels for air. Of the 503 surface wipe samples, 482 were below the health-based screening level of 1 ug/100 cm^2 and 84% of all samples were non-detect. After BMPs, only two locations exceeded the screening level for surface wipes. In one location, the wipe sample was collected directly from the caulk surface. That caulk will be removed, and none of the other eight wipe sample locations in that room were above the screening level. The other room with one location above the screening level post-BMP was only slightly above that level (at 2.6 ug/100 cm^2) while nine other post-BMP surface wipe locations from throughout the same room were non-detect. This data demonstrates that the PCB exposure pathways of greatest concern, namely air and dust, are being addressed in a manner that makes the schools safe, and that the TSCA standard is currently being met at MHS and JCES, even without any additional remediation.

Second, through the implementation of an ongoing program of BMPs, which requires continuous cleaning of the schools, in conjunction with the District's planned removal of PCB-containing caulk and other measures in this approval (including periodic surface wipe and air testing that demonstrate the efficacy of these measures), EPA has determined that conditions at the school will continue to protect public health and meet the TSCA standard until all the building components covered by this approval are removed as part of school renovation or demolition.

Finally, this EPA approval does not cover the removal or disposal of the PCB-contaminated caulk because the TSCA PCB regulations do not require EPA approval of caulk disposal so long as the

disposal is in accordance with 40 CFR 761.62(a) or (b). We have concluded that the District's proposal for disposal of PCB-contaminated caulk is consistent with these regulatory requirements. EPA's approval does apply to the remediation measures pertaining to the PCB remediation waste in contact with the PCB-contaminated caulk.

This approval does not relieve the District and its consultants from complying with other applicable TSCA PCB and Federal regulations, or state and local regulations and permits. Departure from this approval without prior written permission from EPA may result in revocation of this approval. If additional information demonstrates that EPA can no longer make a no unreasonable risk determination, EPA will modify or revoke the approval.

We appreciate the District's efforts in addressing PCBs at schools within the District. Please call Steve Armann at 415.972.3352 if you have questions regarding this TSCA PCB approval.

Sincerely,

Jeff Scott, Director
Land Division

Enclosure: Santa Monica Malibu Unified School District PCB Cleanup Application (transmitted electronically)

cc: Stewart Black, DTSC